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Attorneys For Plaintiffs  
MEHDI HAGHIGHI and JANA LEE HAGHIGHI

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE CENTRAL DISTRICT OF CALIFORNIA

MEHDI HAGHIGHI, an Individual, ) Case No. CV 12-08967- DSF- AJW  
JANA LEE HAGHIGHI, )  
an individual )

Plaintiffs,

vs.

JPMORGAN CHASE BANK, a  
Corporation, and DOES 1-50,  
inclusive

Defendants

) NOTICE OF ERRATA  
) FOR CLARITY AND CORRECTION IN  
) PLAINTIFFS' OPPOSITION MEMO AND  
) STATEMENT OF GENUINE ISSUES

) DATE : September 8, 2014  
) TIME : 1:30 p.m.  
) CTRM: 840

) Action Filed : August 19, 2010  
) Action Removed : October 17, 2012

COMES NOW MEHDI HAGHIGHI and JANA LEE HAGHIGHI, ("Plaintiffs")  
and files this Notice of Errata for clarification and corrections in the Plaintiffs Opposition  
Memorandum, Document ("Doc.") 153, and Statement of Genuine Issues, Doc 154-1 filed  
August 18, 2014 in Opposition to the Defendant JPMorgan Chase Bank's Motion for  
Summary Judgment, or in the Alternative, Partial Summary Judgment.

This Notice clarifies and corrects errors in Doc. 153 and 154-1 which occurred as  
Counsel did not physically see the computer errors from a visual infirmity and from  
staring into a computer screen for excessive hours and days while preparing documents.

1 1. The following corrections are made in the Statement of Genuine Issues (“SGI”)

2 A. The word deposition (“depo”) was intended to be used rather than the  
3 word declaration (“Dec.”) in SGI Nos. 12, 13, 14, 16, 18, 19, 20, 21, 22, 23, and 24 with  
4 respect to Jana Lee Haghighi (“JL Haghighi”), thus the correction will be:

5 JL depo. 12:11-25 through 14:1-5 in lieu of

6 JL Dec. 12:11-25 through 14:1-5

7 B. The word deposition (“depo”) was intended to be used rather than the  
8 word declaration (“Dec.”) in SGI Nos. 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23,  
9 and 24 with respect to Mehdi Haghighi (“M. Haghighi”). In addition, the number 1 was  
10 inadvertently deleted from M. Haghighi page number 14, so that the M. Haghighi pages  
11 being referenced were 13:1-25 through 14:1-4, instead of 13:1-25 through 4:1-4, thus the  
12 correction will be:

13 M. Haghighi depo 13:1-25 through 14:1-4; and 28:1-21 in lieu of

14 M. Haghighi Dec. 13:1-25 through 4:1-4; and 28:1-21

15 C. The word deposition (“depo”) was intended to be used rather than the  
16 word declaration (“Dec.”) in SGI No. 25 and 26 thus the correction will be:

17 M. Haghighi depo 18:1-16 in lieu of

18 M. Haghighi Dec. 18:1-16

19 2. In Doc. 153, on page 2, lines 21 - 22, the July 23, 2014 letter is Exhibit G in the  
20 Dennis Palmieri declaration.

21 3. In Doc. 153, on page 3, line 4, the July 28, 2014 letter is Exhibit H in the Dennis  
22 Palmieri declaration, and the word adopted means effective beginning on page 21, ¶40,  
23 line 13, and all use of the word adopted in the remainder of Doc 153 as noted on page one  
24 in the July 28, 2014 letter.

25 Dated: August 21, 2014

Respectfully submitted

26 /s/ Dennis Palmieri

27 DENNIS PALMIERI  
28 Counselor and Attorney  
Attorney for Plaintiffs